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8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA
10

11 JAIME CALZADA; MIGUEL
CALZADA; and CHERYL BACA, on
12 behalf of themselves and all others
similarly situated,

13 Plaintiffs,

14 v.

15 TIME WARNER CABLE LLC, a
16 Delaware Corporation, and DOES 1
through 100, Inclusive,

17 Defendant.
18

No. CV 01701-DMG-JCG

**JOINT STIPULATION FOR A
SECOND EXTENSION OF TIME
FOR DEFENDANT TIME WARNER
CABLE TO RESPOND TO
COMPLAINT IF PLAINTIFFS DO
NOT FILE AN AMENDED
COMPLAINT**

STIPULATION

IT IS HEREBY STIPULATED AND AGREED, by and between plaintiffs Jaime Calzada, Miguel Calzada, and Cheryl Baca ("Plaintiffs") and defendant Time Warner Cable LLC ("TWC"), through their counsel of record, as follows:

Recitals:

1. On January 27, 2011, Plaintiffs commenced this action in the Superior Court of the State of California for the County of Los Angeles, titled *Jaime Calzada, Miguel Calzada, and Cheryl Baca, on behalf of themselves and all others similarly situated, v. Time Warner Cable LLC, a Delaware Corporation, and Does 1 through 100, inclusive*, as Case Number BC 453904 ("Complaint").

2. On February 9, 2011, Plaintiffs served the summons and Complaint on TWC.

3. On February 28, 2011, TWC filed and served a Notice of Removal, effecting removal of the action to this Court.

4. Pursuant to Central District Local Rule 8-3, the parties stipulated to extend the time within which TWC must answer or otherwise respond to the Complaint to April 4, 2011.

5. During the conference of counsel pursuant to Central District Local Rule 7-3, which took place from March 21 through March 28, 2011, the parties discussed the basis for TWC's prospective motion to dismiss Plaintiffs' second claim for relief for violation of the Unfair Competition Law and two of the Plaintiffs' first claim for relief for violation of Penal Code section 632. On March 28, 2011, Plaintiffs' counsel advised TWC's counsel that Plaintiffs intend to file an amended complaint on or before April 1, 2011, to correct deficiencies in the Complaint identified during the conference of counsel.

6. The parties agree that upon service of the amended complaint, TWC shall have the time permitted under the Federal Rules of Civil Procedure to file its response to the amended complaint.

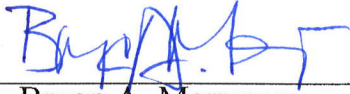
7. In the event Plaintiffs do not file an amended complaint, however, TWC will have until April 15, 2011, to answer or otherwise respond to the Complaint.

Stipulation:

Pursuant to Federal Rule of Civil Procedure 15(a)(3) and Central District Local Rule 8-3, all parties stipulate and agree, through their respective counsel of record, that: (1) if Plaintiffs file an amended complaint, TWC shall have the time permitted under the Federal Rules of Civil Procedure to respond to the amended complaint; and (2) in the event Plaintiffs do not file an amended complaint on or before April 1, 2011, TWC shall have until April 15, 2011, to answer or otherwise respond to the Complaint.


Dated: March 29, 2011

WHITE & CASE LLP

By: 
Bryan A. Merryman
Attorneys for Defendant
TIME WARNER CABLE LLC

Dated: March 29, 2011

ARIAS OZZELLO & GIGNAC LLP

By: 
Mark Ozzello
Attorneys for Plaintiffs
JAIME CALZADA, MIGUEL
CALZADA AND CHERYL BACA